

EXHIBIT 1

The Honorable Laura C. Inveen

SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR KING COUNTY

D.F.,

Plaintiff,

v.

THE CORPORATION OF THE PRESIDENT
OF THE CHURCH OF JESUS CHRIST OF
LATTER-DAY SAINTS, a Utah corporation
sole; LDS SOCIAL SERVICES a/k/a LDS
FAMILY SERVICES, a Utah corporation; and
the "MORMON CHURCH" THE CHURCH
OF JESUS CHRIST OF LATTER-DAY
SAINTS, an unincorporated association,

Defendants.

NO. 06-2-18131-0 KNT

DECLARATION OF PAUL D.
RYTTING IN SUPPORT OF
DEFENDANT CORPORATION OF
THE PRESIDENT OF THE CHURCH
OF JESUS CHRIST OF LATTER-
DAY SAINTS' MOTION TO
DISMISS AND/OR FOR SUMMARY
JUDGMENT

I, Paul D. Rytting, declare as follows:

1. My name is Paul D. Rytting. I am over the age of eighteen and I make these statements based upon personal knowledge.
2. I have been a member of the Church of Jesus Christ of Latter-Day Saints ("the Church") all of my life. I currently function as the Risk Manager for the Corporation of the President of the Church of Jesus Christ of Latter-Day Saints ("COP") and am familiar with the

DECLARATION OF PAUL D. RYTTING IN SUPPORT OF
DEFENDANT CORPORATION OF THE PRESIDENT OF THE
CHURCH OF JESUS CHRIST OF LATTER-DAY SAINTS
MOTION TO DISMISS AND/OR FOR SUMMARY JUDGMENT

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1 legal organization of COP and the Church. I have worked in similar or related positions for
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3 fifteen years.
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5 3. For approximately 75 years, COP has been incorporated as a corporation sole
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7 under Utah law. COP has its headquarters in Salt Lake City, Utah. It hires and pays
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9 employees, owns significant assets and carries out church business.
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11 4. The Church, in contrast, exists solely as an ecclesiastical organization. In its
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13 unincorporated form, the Church holds no assets or property. It does no business in any state,
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15 nor is it registered to do so. The Church has no employees, and has no money from which to pay
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17 salaries. The Church has no asserts or property from which a judgment can be satisfied.
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19 5. The Church has more than 27,000 congregations. There are 12.6 million
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21 members worldwide, with 245,665 in the State of Washington as of December 31, 2005.
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23 6. The Church has no corporate identity and no articles of association, bylaws, or
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25 rules governing its legal existence. Instead, the Church is organized and governed by scripture,
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27 by modern revelation, and by ecclesiastical doctrines and believes of the Church.
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29 7. Under Church doctrine, the Church functions as the Kingdom of God on earth.
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31 From time to time, the president or other "general authorities" of the Church provides spiritual
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33 and doctrinal guidance to local Church leaders and to the general membership. Local Church
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35 leaders also perform functions similar to those performed at other religious organizations,
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37 including blessings, baptisms, confirmations, ordinations, and the calling of members to serve in
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1 volunteer ecclesiastical positions.

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3 I declare under penalty of perjury that the foregoing is true and correct.

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5 SIGNED at Salt Lake City, Utah, this 2nd day of JAN., 2007.

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11 PAUL D. RYTTING

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17 DATED this _____ day of _____, 2006.

18
19 GORDON MURRAY TILDEN LLP

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21
22
23 By _____
24 Charles C. Gordon, WSBA #1773
25 Jeffrey I. Tilden, WSBA #12219
26 Attorneys for Defendants
27 The Corporation of the President of the Church
28 of Jesus Christ of Latter-Day Saints
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